TENDLER Cellular

William T. Bradfield, President

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December 29, 1994

Federal Communications Commission
Office of the Secretary
1919 M Street, N.W.
Washington, D.C. 20554

Re: Letter in Support of Notice of
Proposed Rulemaking Docket No. 94-102

Dear Sir/Madam:

This is in response to the NPRM released October 19, 1994 in which comments were requested with respect to, inter alia, whether cellular phone manufacturers should be required to provide apparatus for determining physical location of a cellular phone placing a 911 call.

Tendler Cellular, a division of Tendler Technologies, is engaged in providing an extremely low cost system, the Emergency Vehicle Location System (EVLS), called the FoneFinder.

The salient feature of this system is that through detection of position via a GPS receiver, a cellular phone broadcasts the identity of the caller, his telephone number, and his latitude and longitude in English. The broadcast of location permits rapid assistance. The broadcast of the cellular phone telephone number permits call-back for dropped calls. The broadcast of location only for emergencies keeps the location of the cellular phone user private until emergency activation, thus avoiding the invasion of privacy issues associated with continuous monitoring of the location of cellular calls by triangulation or range finding systems.

The result is that there is absolutely no infrastructure cost, no changes to cellular phone switches, and no cost to the recipient of the message (dispatcher) as the identity and

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location of the stricken individual is broadcast verbally. There is no format other than English, which makes the system instantly deployable and at low cost.

The FoneFinder system meets all the criteria set forth in the NPRM of location, identity, and cellular phone number of the caller, along with an indication of the type of emergency. EMS units report that this type of system provides the essential information which can be used with virtually no training and no hardware cost. It is noted that EMS helicopter crews already use raw lat./lon. to ascertain the location of an accident or other emergency.

The magnitude of the problem of locating cellular 911 callers is documented in Massachusetts at 218,000 911 cellular calls in 1993. This annualizes to more than 10 million cellular 911 calls nationwide, all with no location information.

Conversations with the authorities at the Emergency Medical System Dispatch Center in Worcester indicated that it was only with difficulty that the location of any of these callers could be identified. So severe is the problem that there was an urgent request on the part of the Massachusetts Department of Public Safety to provide such location assistance as soon as possible.

Tendler Cellular currently has two embodiments of the FoneFinder, namely a hands free cradle/EVLS retrofit module and a unitary all-in-one GPS/Cellular Phone/EVLS. With respect to the hands free cradle/EVLS, the cost for implementation is under $200 for a retrofit package including a hands-free cradle which incorporates the EVLS board, a GPS receiver, and antenna. The additional cost to provide a unitary cellular phone with a GPS and EVLS is an incremental cost of approximately $200.

With respect to the hands-free cradle/EVLS module, the company provides activation upon airbag deployment, through stolen vehicle actuators, through the manual pushing of a mayday button, and through remote pager activation. The result is that cars so equipped would enable rescue within minutes.

With no infrastructure cost plus the ability for instant deployment, such a system more than meets the requirements of the NPRM. It is therefore Tendler Cellular's position that it is in favor of the requirement.

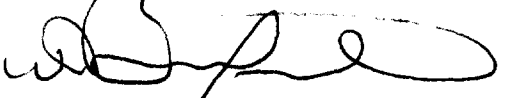
It is noted that others may oppose the requirement based on cost per cell site, with the cost per cell site for ranging or direction finding systems being on the order of between

$500K-50K per cell site. However, with the FoneFinder EVLS system, these costs are completely absent. Moreover, where the above-mentioned systems require one and a half to two and a half years to implement per community, the FoneFinder system is instantly deployable.

With the requirement that there be a way of locating the stricken vehicles or personnel, it is imperative that the FCC require a system which is instantly deployable at minimum cost. It is Tendler Cellular's position that one such system presently exists, namely the FoneFinder system.

Respectfully submitted,

TENDLER CELLULAR



William T. Bradfield
President

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